

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:  City of Detroit, Michigan,  Debtor.
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Bankruptcy Case No. 13-53846  
Judge Thomas J. Tucker  
Chapter 9

**STIPULATION FOR ENTRY OF ORDER GRANTING FOURTH  
ADJOURNMENT OF HEARING DATE AND EXTENSION OF THE  
DEADLINE TO FILE REPLY TO RESPONSE TO MOTION OF THE  
DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 (“DFFA”)  
FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015  
GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF  
DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812  
RELATED TO THE GRIEVANCE FILED ON BEHALF OF FIRE  
FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA’S  
REINSTATEMENT AND FOR RELATED RELIEF**

The City of Detroit, Michigan (“City”) and the Detroit Fire Fighters Association (“DFFA”), by their undersigned counsel, hereby stipulate and agree as follows:

1. On March 15, 2017, the DFFA filed the Motion for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit Resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola’s Reinstatement and for Related Relief (“Motion”) [Doc. No. 11811].
2. The City filed its response on April 5, 2017 [Docket No. 11837].

3. The matter is currently set for hearing on Wednesday, August 23 2017, and the Court has set the deadline for the DFFA to file its reply brief as August 16, 2017 [Docket No. 11958].

4. The parties have conferred and have agreed to adjourn the hearing until Wednesday, September 20, 2017 at 1:30 p.m. and further ask that the Court extend the deadline for the DFFA to file its reply to the City's response to the Motion through and including September 13, 2017.

WHEREFORE, the Parties respectfully request that the Court enter an order adjourning the hearing on the Motion to September 20, 2017 at 1:30 p.m. and extending the deadline for the DFFA to file its reply to the City's response to the Motion through and including September 13, 2017, in substantially the same form as the proposed order attached as Exhibit 1.

STIPULATED AND AGREED TO ON August 15, 2017:

LAW OFFICE OF BARBARA A. PATEK, P.L.C.

By: /s/ Barbara A. Patek

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**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9
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**ORDER GRANTING FOURTH ADJOURNMENT OF HEARING DATE  
AND EXTENSION OF THE DEADLINE TO FILE REPLY TO RESPONSE  
TO MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF  
LOCAL 344 (“DFFA”) FOR ENTRY OF AN ORDER ENFORCING THE  
NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA  
AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA  
CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF  
OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA’S  
REINSTATEMENT AND FOR RELATED RELIEF**

Upon the Stipulation for Order Granting Fourth Adjournment of Hearing Date and Extension of the Deadline to File Reply to Response to Motion of the Detroit Fire Fighters Association, IAFF Local 344 (“DFFA”) for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola’s Reinstatement and for Related Relief [Doc. No. 11811] (“Motion”); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT the hearing on the Motion now set for August 23, 2017 at 1:30 p.m. is adjourned to September 20, 2017 at 1:30 p.m.;

IT IS FURTHER ORDERED THAT the deadline for the DFFA to file its reply to the City's response to the Motion is hereby extended through and including September 13, 2017.